EXHIBIT D

CONFIDENTIAL Prepared at Request of Counsel in Anticipation of Litigation

December 23, 2021

Chase T. Brockstedt
Baird Mandalas Brockstedt LLC
1413 Savannah Rd.
Lewes, DE 19958

Reference: New-Indy, Catawba, SC

Subject: Quantification of New-Indy Wastewater Treatment System Emissions

Dear Mr. Brockstedt:

Per your request, I have prepared the following analysis of available methods for quantifying air emissions from impoundments, as applicable to New-Indy's Catawba, SC paper mill wastewater treatment system.

My *curriculum vita* (Attachment A) summarizes my education and career, and provides examples of my experience in air monitoring and related fields. The opinions expressed in this letter are made with a reasonable degree of environmental and scientific certainty, but I reserve the right to supplement this letter if and when more information becomes available.

INTRODUCTION

Computerized atmospheric dispersion modeling is often used to quantify the impact of air pollution emissions on ambient air quality. Such models require meteorological and emission source data to drive the algorithms they use to simulate how pollutants are distributed about an emission source. The reliability of dispersion modeling results is limited by the quality of its input data.

The best and most accurate way to obtain the requisite dispersion model input data is by direct measurement. Where direct emissions measurement is not feasible, there exist mathematical models that can be used to estimate emissions in a form that can be input to air dispersion models. Using one model's results to drive another model can obviously compound errors, reducing confidence in the final results. Where possible, it is best to actually measure the parameters upon which analyses and decisions will be based.

Throughout this report, I will discuss these two types of models:

- Emission models—computerized calculations that estimate actual emissions, based on known facility conditions, such as wastewater chemical characteristics
- Atmospheric dispersion (or "air") models—computerized formulations that combined information on emissions with meteorological conditions to project ambient air pollutant concentrations.

The New-Indy wastewater treatment system's total reduced sulfur compound emissions (TRS) are released to the atmosphere predominantly as "fugitive emissions"—emission that are not released via a smokestack or vent. TRS is comprised of up to four compounds: hydrogen sulfide (H_2S), methyl mercaptan, dimethyl sulfide, and dimethyl disulfide. Much of these emissions come from very large wastewater treatment and storage impoundments that are part of the mill's wastewater treatment plant (WWTP). Since fugitive emissions are not released through a stack or vent, they cannot be measured using standard US EPA source testing methods.

There are several fugitive emissions quantification methods available for developing the data needed for modeling air quality impacts from WWTP facilities. This report presents each of the available methods, assesses their suitability for the New-Indy WWTP emission sources, and recommends the most accurate and reliable approach for developing emission estimates from the WWTP for use in New-Indy's air dispersion modeling.

1. TEMPORARY/PERMANENT TOTAL ENCLOSURE

One method for quantifying a fugitive source's emissions to enclose it in a temporary or permanent total enclosure. US EPA has developed Standard Method 204[1] to describe the process for implementing this process.

This method was used by New-Indy to measure emissions from the post-aeration basin. It is likely that numerous other pulp and paper mill wastewater facilities' impoundments have employed Method 204 but, as an EPA standard method, there is no need to receive case-by-case approval to do so—so there is not a record of its application to such emission sources.

In the case of a permanent enclosure, if there are no natural draft openings, concentrations and exhaust gas flow may be measured directly. For an impoundment temporary total enclosure, the method may to be modified by the addition of a "sweep" flow in order to accurately simulate free low mass transfer.

Total enclosure can pose a technical and financial challenge—especially for large impoundments such as New-Indy's Aerobic Stabilization Basin (ASB). However, total enclosure methods (both temporary and permanent) have been successfully employed with large impoundments by publicly owned treatment works. This method is considered the "gold standard" from the standpoint of accurately characterizing emissions from such emission sources. It can be instrumented with continuous monitoring instruments, providing temporal resolution of emissions—something not practicable using most other techniques.

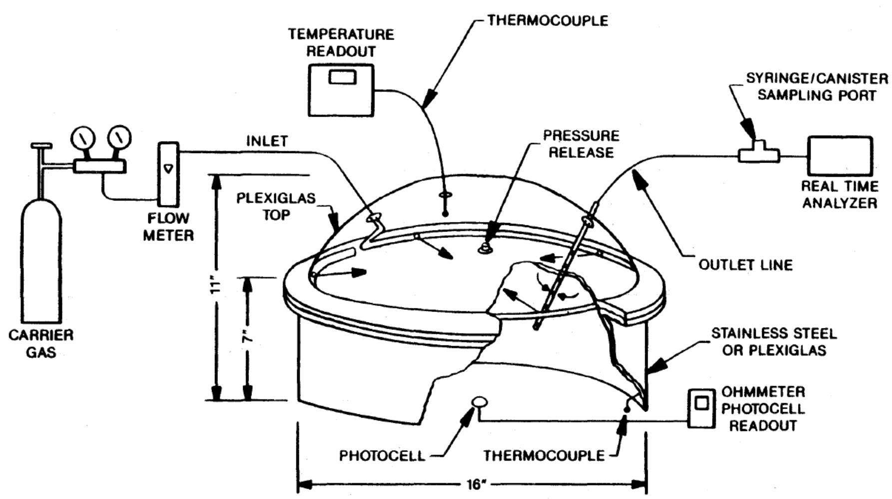
In addition to enabling direct emission measurement, permanent enclosure can be a prerequisite to effective add-on emissions/odor control measures. The lead time for a total enclosure can be a matter of months, due to the need for engineering and construction.

[1] METHOD 204 - CRITERIA FOR AND VERIFICATION OF A PERMANENT OR TEMPORARY TOTAL ENCLOSURE, US Environmental protection Agency, January 2019, https://www.epa.gov/sites/default/files/2019-06/documents/method_204_0.pdf, accessed December 20, 2021.

2. FLUX CHAMBER

Rather than confining all of an impoundment's emissions and sampling at a defined point, a flux chamber measures emission rate over one or more limited sample areas of an impoundment (e.g., 1 square meter) and extrapolating those measurements to the entire surface area. This is obviously more applicable to impoundments that have consistent emission rates, across the surface area. If spatial variability is expected, multiple test areas are indicated—the greater the expected variability, the more sampling locations are required to adequately characterize the emission rate. Figure 2 illustrates the general techniques.

Figure 2. Flux Chamber Technique for Emission Rate Measurement



US EPA's Office of Research and Development, as well as academic researchers, have developed flux chamber methods and applied them broadly to surface water bodies to quantify a broad range of air pollutants[2]. The National Council for Air and Stream Improvement (NCASI)—a pulp and paper industry research consortium—has supported flux chamber measurements of paper mill impoundment emissions and found it to be an effective tool for many applications[3]. NCASI used measurements from flux chambers and other techniques as the foundation for development of their wastewater processing air emissions model, H2SSIM. This computerized model uses information on influent wastewater chemical and physical data to estimate emissions from typical well-operated wastewater treatment facilities.

The flux chamber method is useful and adaptable for characterizing emissions from most of New-Indy's wastewater and sludge holding basins and treatment systems. It may be of only limited usefulness for an emission source such as the Aeration Stabilization Basin (ASB), due to its expected spatial variability of emissions, and the aerators constituting physical obstructions to implementing flux chamber monitoring.

---

[2] Bart Eklund (1992) Practical Guidance for Flux Chamber Measurements of Fugitive Volatile Organic Emission Rates, Journal of the Air & Waste Management Association, 42:12, 1583-1591, DOI: 10.1080/10473289.1992.10467102.

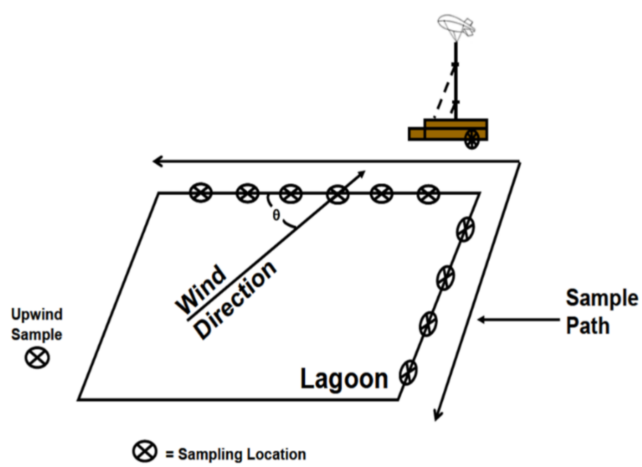
[3] EMISSIONS OF REDUCED SULFURCOMPOUNDS AND METHANE FROM KRAFT MILL WASTEWATERTREATMENT PLANTS, TECHNICAL BULLETIN NO. 956, NCASI, SEPTEMBER 2008.

The flux chamber technique is suitable for emissions monitoring of fairly homogenous impoundments lacking physical obstructions such as New-Indy's primary clarifier, effluent holding ponds, and sludge lagoons—all of which may be emitting significant amounts of H_2S and other TRS compounds, including methyl mercaptan. It can provide high quality, cost effective measurements and can be implemented relatively quickly—over a matter of several weeks.

3. BOUNDARY LAYER EMISSIONS MONITORING

Instead of measuring emissions from a defined sample area of an impoundment, the boundary layer emissions monitoring technique seeks to quantify the mass flow of a pollutant across a vertical downwind surface by integrating across a two-dimensional sampling array. Figure 3 illustrates the basic set-up.

Figure 3. Boundary Layer Emissions Monitoring Set-Up



NCASI TB 956 describes how the boundary layer emission monitoring technique was applied at several paper mill wastewater impoundments during the Council's model development program. Recently, US EPA has been using a similar approach (Remote Emissions Quantification, Other Test Method OTM 33A) and measurements from their Geospatial Measurement of Air Pollution (GMAP) system to directly measure methane (a strong greenhouse gas) emissions from oil and gas drill pads[4].

Provided there is a clear path about an impoundment, a boundary layer emissions measurement program can be executed in a matter of several weeks. NCASI's conclusion is that this method is particularly useful for assessing paper mill emission sources and provides a high level of accuracy[5].

[4] Halley L. Brantley, et al., Assessment of Methane Emissions from Oil and Gas Production Pads, using Mobile Measurements, Environ. Sci. Technol. 2014, 48, 14508−14515.

[5] EMISSIONS OF REDUCED SULFURCOMPOUNDS AND METHANE FROM KRAFT MILL WASTEWATERTREATMENT PLANTS, TECHNICAL BULLETIN NO. 956, NCASI, SEPTEMBER 2008.

4. EMISSIONS MODELING

Regardless of whether an emissions model is derived from theoretical first principle or is an empirical (experimental) construct, it must be validated against actual measurements and is only considered reliable across the range of conditions that defined the evaluation database. ***Modeling*** wastewater treatment and impoundment emissions, as opposed to directly ***monitoring*** them, requires knowledge of the chemical and physical characteristics of the wastewater influent, as well as those of the receiving wastewater treatment of storage impoundment. Depending on the specific wastewater emissions model employed, additional input data will be required. Wastewater emission models assume steady-state conditions and are inadequate for quantifying temporally-varying influent conditions.

New-Indy employed US EPA's WATER9 model to characterize some of its impoundment emissions, and the H2SSIM model, developed by NCASI to estimate emissions from other sources, including the ASB—New-Indy's largest source of reduced sulfur compound emissions that include H_2S, methyl mercaptan, and other TRS compounds. H2SSIM was specifically developed to estimate H_2S and TRS emissions from properly designed and well-operated paper mill wastewater treatment systems. New-Indy's submittals to US EPA and SC DHEC have identified a number of issues with its wastewater treatment system and wastewater expert Ken Norcross has described the current operating conditions that are not consistent with the assumptions used in the NCASI H@SSIM model. This raises concern as to whether it is, indeed, a properly designed and well-operated system. If not, the emissions models are of dubious value in estimating actual emissions. Given these conditions, it is not even possible to quantify the error limits associated with such a modeling exercise.

5. QUANTIFYING NEW-INDY WASTEWATER EMISSIONS BY MONITORING AND MODELING

Emissions modeling offers several advantages over actual direct measurement:

- Quicker results
- Lower execution cost
- Ability to explore how influent process/chemical/physical changes will affect air emissions.

These advantages can only be reliably achieved by using a validated model for its intended type of facility, and operating within its evaluation parameter ranges. In the case of New-Indy, the facility's regulatory filings and the findings of wastewater expert Ken Norcross cast great doubt as to whether its wastewater treatment system meets the models' assumptions of being properly designed for its current use, and well operated. If it does not fit within the models' framework, it is not even possible to quantify the degree of error that could occur. In contrast, emissions monitoring provides high accuracy and reliability—regardless of the condition of the treatment system or how well it is being operated. Direct monitoring also permits identification and speciation of the various TRS compounds (including H_2S and methyl mercaptan) and other odoriferous and toxic emissions (e.g., methanol).

There are several direct monitoring techniques that could be used for generating highly reliable, accurate emission rate measurements from New-Indy's WWTP impoundments, including the ASB. With respect to the ASB, the permanent/temporary total enclosure and boundary layer emission measurement techniques are both feasible. I recommend that one of these methods be used to provide reliable emission rate inputs to the air dispersion model.

6. NEW-INDY'S DISPERSION MODEL ANALYSIS REPORT

Despite the availability of methods to directly measure emissions from the Catawba mill's wastewater treatment system components, New-Indy used theoretical wastewater emission models with unproven and likely flawed technical adequacy, to quantify its TRS and H_2S releases. When those values, which are likely quite understated given the reported operation condition of New-Indy's WWTP, were used as input to New-Indy's air dispersion model, the projected maximum 24-hour average H_2S and TRS concentrations were 14.3 and 52.2 μg/m^3, respectively[6].

New-Indy then compared is unreliable air dispersion modeling results for H_2S to South Carolina's Standard No. 8 Toxic Air Pollutant Maximum Acceptable Ambient Concentration (MAAC) of 140 μg/m^3, South Carolina does not have a MAAC for TRS, the principal components of which are H_2S, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide. South Carolina has assigned methyl mercaptan a MAAC of 10 μg/m^3 but New-Indy's Air Dispersion Modeling Analysis Report does not address predicted methyl mercaptan emissions at all. Subtracting the modeled H_2S impact from the TRS projection yields a non-H_2S concentration of 37.9 μg/m^3, If even one-third of this remaining TRS is methyl mercaptan, New-Indy's own dispersion modeling, that relied on unreliable and likely understated wastewater modeled emission inputs, would exceed the applicable MAAC by 25%.

In conclusion, the New-Indy's October 2021 Air Dispersion Modeling Analysis does not demonstrate compliance with Standard No. 8. As discussed above, the likely issues associated with the theoretical wastewater emissions model used to provide input to the air dispersion model raises considerable doubt as to whether even the H_2S modeling results are sufficient to demonstrate compliance with Standard No. 8. Actual air emission ***monitoring*** of all TRS-emitting WWTP facilities is necessary to determine whether Standard No. 8 compliance has been achieved. . Actual air emission *monitoring* of all TRS-emitting WWTP facilities is necessary to determine whether Standard No. 8 compliance has been achieved.

Please let me know if you have any questions or wish to discuss ERM's findings.

Yours sincerely,

Richard H. Osa, QEP
Technical Director

[6] AIR DISPERSION MODELING ANALYSIS, NEW-INDY CATAWBA, LLC – CATAWBA, SC MILL, OCTOBER 2021.

Attachment A

Richard H. Osa, QEP Curriculum Vita

Rick Osa, QEP

Technical Director

ERM

December 23, 2021
Reference: New-Indy, Catawba, SC

Rick has experience in a broad range of air quality management activities, having performed Clean Air Act permitting, legislative and regulatory analyses, as well as compliance planning and implementation. Rick has supported a broad range of industrial operations, with particular concentration in the energy, metals, mining, and food processing sectors. He has performed air permitting in 38 different states, and all EPA regions. These have included PSD and Non-Attainment New Source Review (major) emission sources, in addition to minor and FESOP facilities. Rick leads ERM's ambient air quality monitoring practice, establishing procedures and standards and managing a number of the firm's larger efforts—from the Kenai Peninsula of Alaska to Guyana, South America.

Experience: 40 years' experience in air quality and environmental management

Email: rick.osa@erm.com

LinkedIn: https://www.linkedin.com/in/richard-osa-a21335b

Education

- MS. Engineering Management
  Northwestern University, USA, 1992
- Graduate studies. Environmental Engineering,
  Illinois Institute of Technology, 1976 -1978
- BS. Physics
  Illinois Institute of Technology, 1976

Professional Affiliations, Registrations, Honors

- Qualified Environmental Professional—Institute for Professional Environmental Practice
- Air Quality Fellow, South Korean Embassy, US Department of State
- Air & Waste Management Association

Languages

English, native speaker

Fields of Competence

- Air emission source permitting
- Ambient air quality monitoring
- Fugitive dust quantification, modeling, and control
- Settled dust investigation
- Atmospheric dispersion modeling
- Legislative/regulatory analysis

Key Industry Sectors

- Power
- Oil & Gas Midstream
- Pulp & paper
- Metals

Key Projects

PSD Air Emission Source Construction Permit
Nucor Steel, Blytheville, AR
Managed quick turn-around PSD air permitting effort. Tasks included:

- Definition of permitting strategy;
- Development of project, facility, and near-by emission source inventories;
- Preliminary air quality analysis (dispersion modeling);
- BACT analysis of modified emission units;
- Refined air quality analysis;
- Agency liaison and negotiation.

A Technical Support Document served as the application framework. Total time from project authorization to receipt of the agency's "completeness" notice was less than 12 weeks for this complex facility modification permitting effort.

Air Construction and Operating Permitting
Mondelēz Chicago Bakery, Chicago, IL
Directed multiple facility modification construction permitting projects and related Title V permit revisions for this bakery which is located in a designated "Environmental Justice" community. Several of the permitting actions were processed under Illinois' expedited permit review program, to accommodate the client's schedule.

Air Permit Compliance Assurance
Evonik Goldschmidt Corporation, Mapleton IL
Designed and implemented an emissions and compliance tracking system for a major synthetic organic chemical manufacturing complex. The system imported existing inventory and production data to document and report compliance with complex Title V operating permit requirements.

John Deere Seeding Group
Air Emission Source Construction Permit, Moline, IL
In partnership with client management, developed permitting strategy for new painting line. Project scope necessitated "one source" (i.e., aggregation) and Environmental Justice considerations. Oversaw development air permit application package and its submittal to Illinois EPA.

Air Permit Revision, Clinton Industrial Sand Mine & Processing Plan
Superior Silica Sand, Clinton, WI
Developed an air permitting strategy and application to add drilling and blasting as authorized operations at an existing sand mine, add a new mine, and add a crusher at an existing mine. The permitting authority considered the new processes and operations to serve as a "support facility"—requiring an aggregation approach. To expedite development, a "commence construction waiver" was obtained.

Sulfur Dioxide Attainment Status Monitoring
Multiple Clients, WI, IL, NY
Designed, installed, and operated three independent monitoring networks, conforming to the requirements of the SO_2 "Data Requirements Rule". The projects' objective is to demonstrate the attainment status of their respective areas. Program quality assurance conforms to 40CFR Part 58 Appendix A specifications, in accordance with the DRR. Operation is planned for at least three years in order to assess compliance with the one-hour NAAQS.

Shipborne Air Monitoring Survey
Confidential Client, Guyana, South America
To document pre-exploration, background air quality, instrumented a research vessel to continuously monitor SO_2, NO_2, H_2S, PM_{10}, VOC, wind speed and direction, temperature, relative humidity, and geographical location. Redundant instruments ensured high data recovery over the survey's six weeks, despite unattended operation. Data were screened to filter out measurements biased by the influence of the ship's engines.

Compressor Station Air Monitoring for Impact Assessment
Williams Cos., Multiple Locations
Recent changes to FERC guidance on preparation of environmental impact assessments (RR9) permits the use of local ambient air quality monitoring data to characterize the impact of existing equipment when performing a cumulative impact analysis. Ambient air monitoring tends to be considerably less conservative than the traditional approach—dispersion modeling. This approach can lead to project approvals with fewer restrictions or, in some instance, demonstrate that an otherwise un-licensable facility upgrade can, indeed, be

authorized. These multi-year ambient air monitoring projects formed both the basis for FERC's revised RR9 guidance, but also its implementation to several large-scale gas pipeline development projects. Twelve (12) monitoring sites were established and operated, continuously monitoring $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, wind speed, wind direction, sigma theta, differential temperature, and solar radiation. The data were telemetered to ERM's database server and posted to a secure web site—accessible to the client.

PSD Pre-Construction Air Quality Monitoring
Nucor Steel, Convent, LA
Designed, installed, and managed data collection at this multi-year, three-site PSD pre-construction monitoring network. Continuously measured parameters consisted of $PM_{2.5}$, SO_2, NO_2, CO, wind speed, wind direction, sigma theta, and ambient temperature. Data were digitally recorded onsite and telemetered to ERM office via cellular modem.

Fenceline Air Quality, Meteorological Monitoring
Zeeland Farm Services, Zeeland, MI
Initial contract consisted of designing a two site (upwind-downwind configuration) $PM_{2.5}$ and PM_{10} monitoring program that met the requirements of a consent agreement. ERM then developed a Quality Assurance Project Plan (QAPP) for the program and obtained regulatory agency approval. The last task of the initial contract was to develop a budget-level cost estimate for the program's implementation. ERM was awarded a second contract—to procure monitoring equipment, install it, and operate the program for two years. This included developing and maintaining a secure web site for real-time data access.

Ambient Particulate, Manganese, Mercury, and Meteorological Monitoring
Nucor Steel, Marion, OH
Designed, installed, commissioned, and managing data collection at this multi-year, two site monitoring network. Manual (filter-based) and continuous automated particulate matter samplers are employed to document ambient air concentrations. Filter samples are analyzed to quantify particulate mercury and manganese concentrations. Wind speed and direction are used to identify culpable source(s) in the event of high concentrations.

Refinery Fenceline Monitoring Support
Delek, Krotz Springs, LA
Managed assessment and upgrade of on-site meteorological monitoring system, to conform to requirements of petroleum refinery fenceline monitoring regulations. Monitoring system was enhanced to provide real-time data for operational use. Parameters consisted of wind speed, wind direction, barometric pressure, ambient temperature, relative humidity, and precipitation. Data are fed into refinery's DCS via fiber optic.

Contaminated Soil Remediation Site Dust Monitoring
Proctor & Gamble, Inwood, WV
Network of continuous dust monitors was established and operated to provide real-time operational data to contractors carrying out contaminated soil remediation plan. Measured particulate matter levels and current meteorological conditions were telemetered to ERM and posted to a secure web site. Remediation contractors relied on the monitoring data to plan the day's operations and deploy appropriate dust control measures.

Publications

Osa, RH, Raine, T and Guido, D. 2020. *Environmental Science Deskbook, Chapter 8, Air; Thomson Reuters, Release #18*.

Osa, RH. 2019*. Case Studies in Ambient Air Monitoring*, Presented at the Industrial Emissions Control Technology XVII Conference, sponsored by Council of Industrial Boiler Operators, August 5 - 8, 2019.

Osa, RH, Raine, T and Guido, D. 2019. *Environmental Science Deskbook, Chapter 8, Air; Thomson Reuters, Release #17*.

Osa, RH. 2018. *Risk Management and Risk Communication of* $PM_{2.5}$ *in the USA*. Presented at 9th World Air Forum, Seoul, Republic of Korea, October 22, 2018.

Osa, RH, Raine, T and Guido, D. 2018. *Environmental Science Deskbook, Chapter 8, Air; Thomson Reuters, Release #16*.

Osa, RH. 2017. *Chicago Storage Pile Controls: Tough and (Perhaps) Getting Tougher*. Presented at Chemical Industry Council of Illinois, June 21, 2018.

Osa, RH. 2017. *Demonstrating Compliance with Ambient Air Quality Standards.* Presented at Federation of Environmental Technologists, Environment Conference, Milwaukee, WI.

Osa, RH, Raine, T and Guido, D. 2017. *Environmental Science Deskbook, Chapter 8, Air; Thomson Reuters, Release #15*.

Osa, RH, Raine, T and Guido, D. 2016. *Environmental Science Deskbook, Chapter 8, Air; Thomson Reuters, Release #14*.

Osa, RH. 2015. *Remote Monitoring Issues.* Lake Michigan Section AWMA, Air Quality Management Conference. Expert Panel Case Study.

Osa, RH. 2015. *Refinery Fenceline Monitoring.* Presented at Chemical Industry Council of Illinois (CICI), Air Issues Seminar.

Osa, RH, Dziubla, D and Rengel, A. 2015. *Ambient PM2.5 Monitoring: PSD Permitting Risk and Risk Mitigation*. Presented at the 108th annual meeting and exhibition of the Air and Waste Management Association, Raleigh, NC.

Osa, RH, Raine, T and Guido, D. 2015. *Environmental Science Deskbook, Chapter 8, Air; Thomson Reuters, Release #13*.

Osa, RH, Dziubla, D and Rengel, A. 2015. *Dust in the Wind--How Does Sand Mining Affect Air Quality?* Presented at the Society of Mining Engineers SME-MN Annual Conference, Duluth, MN.

Osa, RH and Dziubla, D. 2013. *Demise of the SMC—Air Monitoring Returns to PSD Prominence.* Lake Michigan Section of Air & Waste Management Association December Newsletter.

Osa, RH and Eliff, H. 2013. Grow Your Garden (Shrink Your Carbon Footprint). Presented at the 106th annual meeting and exhibition of the Air and Waste Management Association, Chicago, IL.

Osa, RH and Palmer, T. 2011. *Analysis of EPA's Proposed Clean Air Restrictions on Oil and Gas Operations*. World Oil Online.

Osa, RH. 2011. *The New Transformer Sequel: Transportation Engineer Becomes Atmospheric Scientist*. Presented at MN/DOT – ACEC/MN Annual Consultant Conference, Minneapolis MN.

Osa, RH, et al. 2009. *Can I Get Credit For These GHG Emission Reductions?* Presented at the 102nd annual meeting and exhibition of the Air and Waste Management Association, Detroit, MI.

Osa, RH. 2008. *Residuals Management: A Key to Shrinking Your Mill's "Carbon Footprint.*" Lake States TAPPI Symposium on the Management and Utilization of Paper Mill Residuals, Green Bay, WI.

Osa, RH and Hermann, D. 2008. *Carbon Sequestration in the Heartland*. 11th Annual Electric Utility Environmental Conference, Tucson, AZ.

Osa, RH, Paine, R. and Campbell, W. 2008. *New Source Review Permitting Challenges*. 11th Annual Electric Utility Environmental Conference, Tucson, AZ.

Osa, RH. 2006. *Environmental Compliance—the EMS Approach to Regulatory Assurance*. Invited Presentation, Acordia-Wells Fargo Risk Management Seminar.

Osa, RH. 2005. *BART and LAER—Clean Air Requirements, Handle with CAIR*. Presented at the annual meeting of the Recycled Paperboard Technical Association.

Osa, RH et al. 2003. *Constructing an Objective Environmental Aspect Ranking System*. Presented at the 96th annual meeting and exhibition of the Air and Waste Management Association, San Diego, CA.

Osa, RH. 2000. *Mercury Source-Receptor Relationships*. Expert Panel: Proceedings, Electric Power Research Institute, EPRI 1000632.

Osa, RH. 1999. *Mercury Toxicity*. Presented at the Air and Waste Management Association "Mercury in the Environment" Specialty Conference, Minneapolis-St. Paul, MN.

Osa, RH. 1997. *Natural Gas Environmental Research & Development: A Market Analysis*. Electric Power Research Institute: EPRI TR-109895.

Osa, RH, and Hakkarinen, C. 1995. *PRIME—an Improved Downwash Model*. Presented at the 21st NATO/CCMS International Technical Meeting on Air Pollution Modeling and its Application, Baltimore, MD.

Osa, RH et al. 1994. *Environmental Consequences of FERC Order No. 636*. Gas Research Institute: GRI-95/0048.

Osa, RH. 1994. *Mercury Atmospheric Processes: A Synthesis Report*. Workshop proceedings from the Expert Panel on Mercury Atmospheric Processes, Tampa, FL.

Attachment B

Index of Information Source Material

1. METHOD 204 - CRITERIA FOR AND VERIFICATION OF A PERMANENT OR TEMPORARY TOTAL ENCLOSURE, US Environmental protection Agency, January 2019, https://www.epa.gov/sites/default/files/2019-06/documents/method_204_0.pdf, accessed December 20, 2021.

2. Measurement Solution: Using a Temporary Total Enclosure for Capture Effeciency Testing, U.S. EPA, USEPA-450/4-91-020a, 1991.

3. Halley L. Brantley, et al., Assessment of Methane Emissions from Oil and Gas Production Pads, using Mobile Measurements, Environ. Sci. Technol. 2014, 48, 14508−14515.

4. Bart Eklund (1992) Practical Guidance for Flux Chamber Measurements of Fugitive Volatile Organic Emission Rates, Journal of the Air & Waste Management Association, 42:12, 1583-1591, DOI: 10.1080/10473289.1992.10467102.